Industrial Stormwater What You Need to Know About the 2008 Multi-Sector General Permit



United States Environmental Protection Agency

- 2008 MSGP Overview
- Steps to Become Authorized
 - Am I eligible for coverage?
 - What stormwater control must I do?
 - What must be in my Storm Water Pollution Prevention Plan (SWPPP)?
 - How do I submit my Notice Of Intent (NOI) to be covered?
- Questions and Answers

Stormwater is.....

Water that runs off during rainstorms and snow melt from...

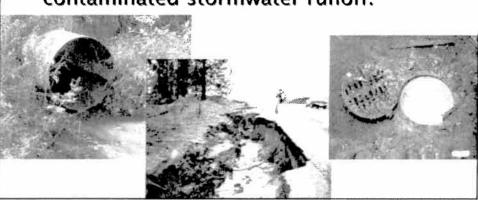
- Construction sites and other surfaces
- Roads, pavement, roofs
- Lawns

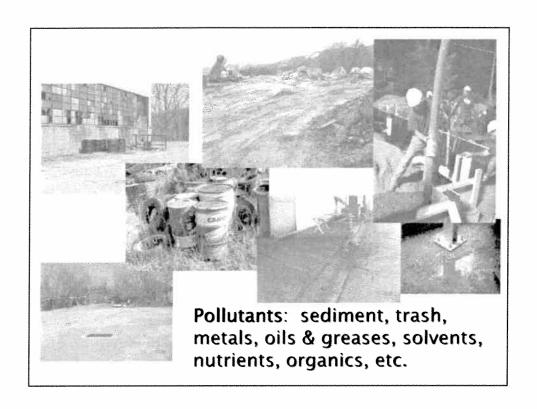


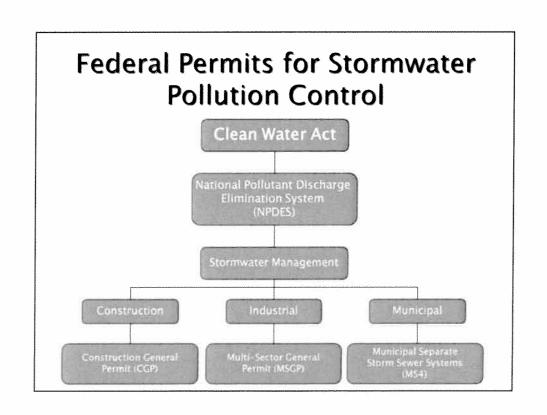


Why Do We Regulate Stormwater?

The primary cause of water pollution throughout the United States today is contaminated stormwater runoff.







What is the 2008 MSGP?

- Multi-Sector General Permit (MSGP)
 - Also known as the Industrial Stormwater General Permit
 - Covers 29 "sectors" of industrial activity
 - Only applies in a few states, territories, Indian Country lands

Recommended Internet bookmark: www.epa.gov/npdes/stormwater/msqp

29 Sectors of Industrial Activity (App. D)

A: Timber Products

B: Paper Products

C: Chemical Products

D: Asphalt/Roofing

E: Glass, Clay, Cement

F: Primary Metals

G: Metal Mining

H: Coal Mines

I: Oil and Gas

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J: Mineral Mining

K: Hazardous Waste

L: Landfills

M: Auto Salvage Yards

N: Scrap Recycling

O: Steam Electric Facilities

P: Land Transportation

Q: Water Transportation

R: Ship/Boat Building, Repair

S: Air Transportation

T: Treatment Works (WWTPs)

U: Food Products

V: Textile Mills

W: Furniture and Fixtures

X: Printing, Publishing

Y: Rubber, Misc. Plastics

Z: Leather Tanning/Finishing

AA: Fabricated Metal Products

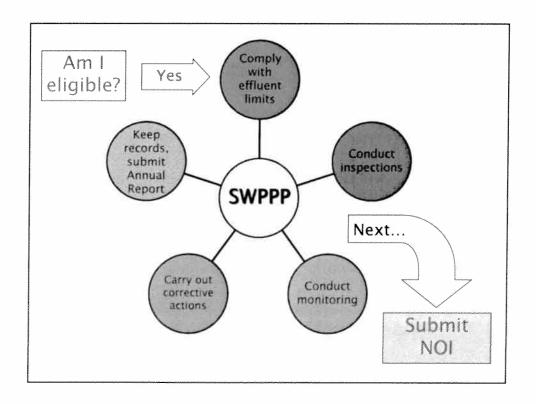
AB: Transportation Equip.

AC: Electronic, photo goods

AD: Non-classified facilities

Steps to Become Authorized

(How to Obtain Permit Coverage)



Am I Eligible for Coverage?

Industrial facilities are required to obtain permit coverage for stormwater if...

- Your facility has a point source stormwater discharge associated with an industrial activity from your property either directly to waters of the United States or to a municipal separate storm sewer system.
- AND either...
 - Your primary SIC Code is regulated by the Industrial Stormwater Regulations

OR...

Your facility engages in one or more of the industrial activities identified by the EPA.

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Stormwater discharge associated with industrial activity means...

the discharge from any conveyance that is used for collecting and conveying stormwater

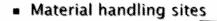
and

that is directly related to manufacturing, processing or raw materials storage areas at an industrial plant.

Am i eliqible?

These discharges/areas include...

- Discharges from industrial, plant yards
- Immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility



Refuse sites





Acre :

These discharges/areas include...

 Sites used for the application or disposal of process waste waters



- Sites used for the storage and maintenance of material handling equipment
- Sites used for residual treatment, storage, or disposal and shipping and receiving areas

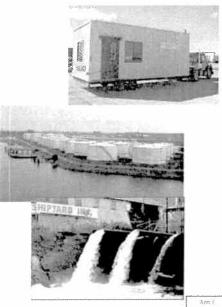
Am i eliqible?

These discharges/areas include...

Manufactured buildings

 Storage areas (including tank farms) for raw materials, and intermediate and final products

 Areas where industrial activity has taken place in the past and significant materials remain and are exposed to stormwater



Minimum Eligibility Requirements

- To be eligible, the facility must:
 - Be located in an area where EPA is the permit authority (Appendix B)
 - Have "primary" or "co-located" industrial activities that are covered by the permit (Appendix D)
 - Have stormwater discharges and/or nonstormwater discharges that are allowed under the permit (1.1)

Am I

Allowable Non-Stormwater
Discharges

- These non-stormwater discharges are eligible for coverage under the permit (1.1.3):
 - Discharges from fire-fighting activities and fire hydrant flushings
 - Potable water (including line flushings), uncontaminated ground or spring water, and uncontaminated water from foundation/footing drains



Allowable Non-Stormwater Discharges

- Uncontaminated condensate
- Irrigation drainage and landscape watering (if all related chemicals applied in accordance with labeling)
- Pavement and building washwaters (if no detergents used and no spills/leaks of toxic or hazardous materials have occurred)





All other non-stormwater discharges must be eliminated or covered under an alternative permit

Discharges Not Covered are those...

- Mixed with unauthorized non-stormwater discharges (1.1.4.1)
- Associated with construction (except for mining or oil & gas operations, and those construction areas that are under 1 acre in size) (1.1.4.2)
- Authorized by a current or previous permit, unless EPA approves in writing (1.1.4.3)
- Subject to EPA effluent limitations guidelines, unless specifically listed in the permit (1.1.4.4)
- Going to a water designated as Tier 3 (Outstanding Natural Resource Water) by a State or Tribe (1.1.4.8)

ARRES

Also, In Order To Be Covered/Eligible...

- Stormwater discharges do not adversely affect endangered species or related habitat (1.1.4.5)
- There are no effects on historic properties, or effects are mitigated (1.1.4.6)
- New discharges do not cause or contribute to an exceedance of a water quality standard (1.1.4.7)

Am I

What Stormwater Controls Must I Do?



Install Control Measures that...

- Are designed, installed, and implemented in accordance with good engineering practices (2.1)
- Meet the permit's selection and design considerations (2.1.1)
- Meet the permit's effluent limits (2.1)

Comply util sifficient times

Comply with Effluent Limits

- Once authorized, permittees are required to meet all applicable:
 - Non-numeric technology-based effluent limits
 - Numeric effluent limits based on effluent limitation guidelines (ELGs)
 - Water quality-based effluent limits
- Failure to meet required effluent limits is a permit violation



Effluent Limits to Minimize Pollutants

- Effluent limits require facility to "minimize" pollutants
 - "Minimize" means "to reduce and/or eliminate to the extent achievable using control measures (including best management practices) that are technologically available and economically practicable and achievable in light of best industry practice" (2)

Limit # 1: You Must Minimize Exposure



- Minimize exposure of industrial materials and activities to stormwater by locating inside or protecting with storm resistant coverings (2.1.2.1)
- The following will help minimize exposure:
 - Grade, berm, or curb to prevent contamination and divert run-on away from industrial activities
 - Address leaks and spills
 - Perform cleaning operations indoors, under cover, or in bermed areas
 - Ensure washwater drains to a proper collection system.

Limit # 2: You Must Have Good \(\) Housekeeping Measures

- Keep all exposed areas clean that are potential sources of pollutants (2.1.2.2)
- The following are examples:
 - Regular facility sweeping
 - Keeping materials orderly and labeled
 - Storing materials in appropriate containers



Limit # 3: You Must Do Maintenance



- Regularly inspect, test, maintain, and repair all industrial equipment and systems to avoid conditions leading to spills or leaks (2.1.2.3)
- Maintain all control measures in effective operating condition (2.1.2.3)
- If control measure needs to be replaced or repaired, make necessary repairs or modifications as expeditiously as practicable (2.1.2.3)

Limit # 4: You Must Have Spill Prevention and Response

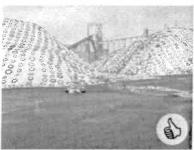
- Minimize the potential for leaks and spills that may be exposed to stormwater (2.1.2.4)
- Develop plans for effective response
- Implement, at a minimum, the following:
 - Labeling of containers susceptible to spills or leaks
 - Barriers between material storage and traffic areas), secondary containment, and procedures for material storage and handling
 - Procedures for expeditiously stopping, containing, and cleaning up spills or leaks
 - Train employees who may cause, detect, or respond to a spill or leak
 - Procedures for notifying facility personnel or other agencies

Limit # 5: You Must Have Erosion and Sediment Control

- Stabilize exposed areas and contain runoff to minimize erosion and sedimentation (2.1.2.5)
- Place flow velocity dissipation devices at discharge locations and within outfall channels to reduce erosion and/or settle

out pollutants (2.1.2.5)





Limit # 6: You Must Have Runoff Management



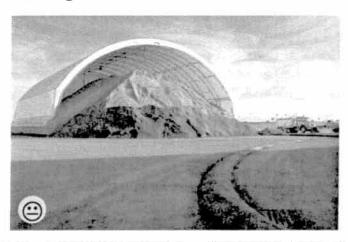
 Divert, infiltrate, reuse, contain, or reduce stormwater runoff to minimize pollutants in discharge (2.1.2.6)

Resources:

- Industrial Stormwater Fact Sheet Series, (www.epa.gov/npdes/stormwater/msgp)
- National Menu of Stormwater BMPs (www.epa.gov/npdes/stormwater/menuofbmps)

Limit # 7: You Must Control Salt Storage Piles/Piles Containing Salt

 Enclose or cover storage piles of salt, or piles containing salt (2.1.2.7)



Limit # 8: You Must Comply with Sector-Specific Effluent Limits

 Refer to Part 8 of MSGP under "Additional Technology-Based Effluent Limits" (2.1.2.8)

Sector J: Mineral Mining (8.J.8)

- Subsector J1: Sand and Gravel Mining
 - Nitrate plus Nitrite Nitrogen 0.68 mg/L
 - Total Suspended Solids 100 mg/L
- Subsector J2: Dimension and Crushed Stone and Nonmetallic Minerals (except fuels)
 - Total Suspended Solids 100 mg/L
- Inactive and unstaffed sites conditional exemption from No Exposure Requirement for routine inspections, quarterly visual assessments, and benchmark monitoring



- Train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing the permit (2.1.2.9)
- Training must cover specific control measures, and the permit's monitoring, inspection, planning, reporting, and documentation requirements (2.1.2.9)
- Recommend training frequency once-per-year (2.1.2.9)





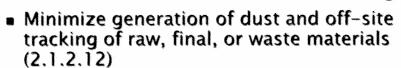
Limit # 10: You Must Eliminate Non-Stormwater Discharges

 Eliminate non-stormwater discharges not authorized by this (or another) permit (2.1.2.10)

Limit # 11: You Must Control Waste, Garbage, and Floatable Debris

 Keep exposed areas free of waste, garbage, and floatable debris, or intercept them before discharge (2.1.2.11)

Limit # 12: You Must Minimize Dust Generation and Vehicle Tracking







Best Management Practices can include...

- Collection and pre-treatment systems
 - Infiltration devices which capture and retain a portion of runoff on- site and allow it to infiltrate into the soil, and in the case of surface basins, evaporate into the air.
 - Sand filters which are used to filter pollutants from runoff from large buildings, access roads and parking lots.
 - Oil and grease trap catch basins which are underground devices that remove oil, grease, litter and coarse sediments from runoff.



and these...

 Vegetative plantings - Filter strips and grassy swales are vegetative practices that act as nature's biofilters to reduce stormwater flows and pollution.





and these...

- Detention/retention, settling, percolation, evaporation, evapotranspiration, filtration, absorption and biological uptake to reduce flows and remove pollutants
 - Examples include dry detention basins, wet retention ponds, and artificial wetlands
- Covers for materials stored outside, such as road salt or coal piles, to prevent exposure to rainfall or runoff



Numeric Effluent Limitations Based on Effluent Limitation Guidelines

- Refer to 6.2.2.1 of MSGP
- Sector J: Mineral Mining (8.J.9)
 - Mine dewatering discharges at crushed stone mining facilities
 - pH Effluent limits: 6.0 9.0
 - Mine dewatering discharges at construction sand and gravel mining facilities
 - pH Effluent limits: 6.0 9.0
 - Mine dewatering discharges at industrial sand mining facilities
 - pH Effluent limits: 6.0 9.0
 - Total suspended solids: 25 mg/L, monthly average; 45 mg/L, daily maximum



Water Quality-Based Effluent Limits

- Permitted facilities must control discharges as necessary to meet applicable water quality standards (2.2.1)
 - If facility determines, or is informed by EPA, that its discharge causes or contributes to an exceedance of water quality standards, the operator must conduct corrective actions to eliminate the problem
 - EPA may also impose additional requirements for a specific facility or require an individual permit if information suggests the facility causes or contributes to a water quality standards exceedance

What is an impaired water? What is a TMDL?

- Under section 303(d) of the Clean Water Act, states, territories, and authorized tribes are required to develop lists of impaired waters.
- These are waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes.
- These jurisdictions establish priority rankings for waters on the lists and develop TMDLs for these waters.
 - A Total Maximum Daily Load, or TMDL, is a calculation of the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards.



Water Quality-Based Effluent Limits

- Discharges to impaired waters (2.2.2)
 - If a final TMDL exists for the impaired water, EPA will inform affected facilities if additional effluent limits or an individual permit are required (2.2.2.1)
 - If no TMDL exists for the impaired water, affected facilities must, in addition to complying with the non-numeric effluent limits, monitor their discharge for pollutant causing the impairment (2.2.2.2)
- Discharges to waters designated as Tier 2 (2.2.3)
 - EPA will inform affected facilities of any additional analyses, effluent limits, or permit conditions necessary to comply with antidegradation requirements, or of the need to apply for an individual permit



Conduct Inspections

- The MSGP requires three types of inspections at all facilities:
 - Routine facility inspections (at least quarterly)
 - Quarterly visual assessments (quarterly)
 - Comprehensive site inspections (annually)
- Routine inspections and visual assessments are not required for "inactive and unstaffed sites" where industrial materials are not exposed to stormwater



Routine Facility Inspections

- Minimum requirements (4.1.1):
 - Scope of inspection:
 - Areas of facility where industrial materials or activities are exposed to stormwater
 - All stormwater control measures used to comply with permit
 - Performed when facility is in operation
 - Performed by qualified personnel
 - At least once a year, performed during a period when a stormwater discharge is occurring



Who can conduct inspections?

- Inspections must be performed by qualified personnel with at least one member of the stormwater pollution prevention team participating
- "Qualified personnel" are those who possess the knowledge and skills to assess conditions and activities that could impact stormwater quality at your facility, and who can also evaluate the effectiveness of control measures



Routine Facility Inspection Documentation



- Routine facility inspection documentation must include (4.1.2):
 - Inspection date, time, weather
 - Name and signature of inspector
 - Previously unidentified discharges of pollutants
 - Control measures that need maintenance or that failed and need to be replaced
 - Incidences of noncompliance
 - Additional control measures needed



Quarterly Visual Assessments

- Once a quarter, collect a sample from each outfall for a visual assessment (4.2.1)
- Modified requirements for situations involving adverse weather, climates with irregular stormwater runoff, areas subject to snow
- For outfalls that are "substantially identical," only one sample is required, with outfalls assessed on a rotating basis

Quarterly Visual Assessments

Visually inspect sample for the following (4.2.1):

- Color
- Odor
- Clarity
- Floating solids
- Settled solids
- Suspended solids
- Foam
- Oil Sheen, and
- Other obvious indicators of stormwater pollution





Quarterly Visual Assessment Documentation

- Quarterly visual assessment documentation must include (4.2.2):
 - Sample location
 - Sample collection date/time; visual assessment date/time
 - Person collecting sample and performing assessment
 - Nature of discharge (runoff or snowmelt)
 - Results of observations
 - Probable sources of any observed contamination
 - If applicable, why impossible to sample in the 1st 30 minutes



Comprehensive Site Inspections

- Minimum requirements (4.3.1):
 - Conduct annually
 - Include all areas of facility affected by permit
 - Must include review of any monitoring data
 - Inspectors must examine:
 - Industrial materials that could contact stormwater
 - Leaks or spills
 - Tracking/blowing of industrial materials or sediment
 - · Controls needing replacement, maintenance or repair
- Document findings (4.3.2) and submit report to EPA (7.2)



Who signs the reports?

- For inspections:
 - Name(s) and signature(s) of the inspector(s)
- For quarterly visual assessments:
 - Name(s) and signature(s) of the personnel performing visual assessment
- For comprehensive site inspections:
 - Name(s) and title(s) of the personnel making the inspection
- For SWPPPs:
 - In accordance with Appendix B, Subsection 11 of the Permit

Break





Conduct Monitoring and Report Your Data

- Types of monitoring to be done:
 - Benchmark monitoring (6.2.1)
 - Effluent limitation guidelines monitoring (6.2.2)
 - State or Tribal-specific monitoring (6.2.3 and 9)
 - Impaired waters monitoring (6.2.4)



When do I have to start monitoring?

- Monitoring starts the calendar quarter after you get coverage for the facility (6.1.7)
 - For example, if your coverage begins May 27th, then you begin monitoring for the quarter beginning on July 1st
- No monitoring required prior to February 27th, 2009

NEW! All monitoring can be submitted online, using the eNOI system to report



Monitoring

- If same parameter must be sampled for 2 different monitoring requirements, permittee can use a single sample to satisfy requirements (6.2)
- Requirements applicable to all monitoring:
 - Report all sample results (can file electronically using eNOI account)
 - Monitor each outfall (unless designated as "substantially identical outfall) (6.1.1)
 - Sample storm events with actual discharges ("measurable storm event") that follows preceding event by at least 3 days
 - Use grab samples from discharge within first 30 minutes of measurable storm event (or as soon as practicable thereafter)
 - Use Part 136 analytical methods (6.2) (for the laboratory doing the sample analysis)



Benchmark Monitoring

- Must monitor for all applicable sectors/subsectors if you have multiple co-located industrial activities occurring onsite
- Part 8J.8 identifies the sector-specific benchmarks for sand and gravel and other mineral mines
- Monitoring required quarterly for 4 quarters (with allowance for modifying schedules in areas with irregular precipitation) (6.2.1.2)
 - Exception for inactive and unstaffed sites (6.2.1.3)
- Benchmark concentrations are not effluent limitations, and exceedances are not directly enforceable (only failure to respond to exceedances is a violation) (6.2.1)



Benchmark Monitoring

- If average of 4 samples <u>does not</u> exceed benchmark, no further monitoring is required for that pollutant (6.2.1.2)
- Natural background exception



Benchmark Monitoring

- If average of 4 samples exceeds benchmark, required to follow up with corrective action investigation, and either:
 - (1) Modify control measures and continue quarterly monitoring until average of 4 additional samples is less than benchmark, or
 - (2) Determine that no further reductions are technologically available and economically practicable and achievable in light of best industry practice, and continue to monitor once per year



Benchmark Monitoring

- Changes from 2000 MSGP to 2008 MSGP:
 - Benchmark monitoring (6.2.1)
 - Modification to procedures to follow if average of first 4 quarterly samples exceed benchmark (6.2.1.2)
 - If exceedance is mathematically certain before the completion of the 4 quarters, permittee required to investigate immediately (6.2.1.2)
 - If exceedance caused solely by natural background levels of pollutant, no more benchmark monitoring is required for permit term (6.2.1.2)

Effluent Limitations Monitoring



(a.k.a., runoff discharge monitoring)

- Applies only industry sectors with applicable effluent limitation guidelines (ELGs) (6.2.2.1), and this includes Sector J: Mineral Mines
- Monitoring required once per year at each outfall (6.2.2.1)
 - No allowance for substantially identical outfall
- If exceed effluent limit, must conduct follow-up actions (6.3)
 - Take corrective action (3.1)
 - Resample within 30 days of corrective action (6.3)
 - Submit an Exceedance Report if resample exceeds limit (6.3.1)
 - Continue to monitor at least quarterly until discharge is in compliance with effluent limit (6.3.2)



Impaired Waters Monitoring

- Monitor for all pollutants causing an in-stream impairment (and for which a Part 136 analytical method exists) (6.2.4.1)
 - <u>Exceptions</u>: biological impairment without indicator/surrogate pollutant, hydrological modification, or temperature



Impaired Waters Monitoring

- If TMDL has been approved/established, no monitoring required until EPA notifies facility of specific requirements
- NEW! Monitor annually at each outfall for pollutant(s) causing the impairment



Helpful Resources

- EPA webcast on MSGP monitoring
- EPA industrial stormwater monitoring guidance available early 2009



Carry Out Corrective Actions

- Refer to actions taken in response to "triggering conditions"
 - Investigation of problem
 - Documentation of problem
 - Modification to control measures to prevent recurrence
- Summaries of corrective actions must be submitted with Annual Report (7.2)
- Two types of triggering conditions:
 - (1) permit violations (3.1), and
 - (2) indication of a potential problem (3.2)



Corrective Actions

- Types of Triggering Conditions
 - Permit violations (3.1) corrective action is required if the discharge is found to exceed applicable water quality standards
 - Unauthorized release or discharge
 - Violation of numeric effluent limit
 - An inspection finds that control measures not properly operated and maintained
 - Indication of potential problem (3.2)
 - Significant change in facility operations changes the quantity or nature of pollutants discharged
 - Exceedance of benchmarks



Corrective Actions

- Deadlines (3.3 and 3.4)
 - Within 24 hours:
 - Describe problem identified
 - Document date problem identified
 - Within 14 days:
 - Summarize corrective action taken or to be taken, or the basis for determining that no action needed
 - Document date corrective action initiated, completed, or expected to be completed
 - Modifications to control measures must be made before the next storm event if possible, or as soon as practicable following that storm event



Corrective Actions

- Effect on Compliance Status (3.5)
 - If triggering condition is a permit violation (3.1), correcting the problem does not remove the underlying violation
 - Failure to take corrective action is an additional violation
 - Consideration to be given towards appropriateness and promptness of correction action in determining enforcement response to permit violations



Keep Records

- Once authorized, permittee required to keep records with the SWPPP (don't send them to EPA!) relating to authorization, inspections, monitoring activities, and other implementation activities (5.4)
- Examples of items for records:
 - Descriptions and dates of significant spills or leaks
 - Documentation of maintenance and repairs of control measures (including when returned to full function)
 - Inspection reports
 - Description of corrective actions

Submit Annual Report

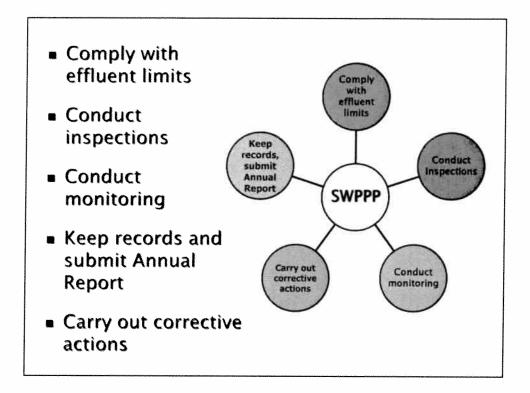


- All permittees must submit an Annual Report to EPA (7.2)
 - Must be sent within 45 days (postmark date) after conducting the comprehensive site inspection
- Each annual report must include:
 - Findings from the facility's comprehensive site inspection (4.3)
 - Summaries of corrective actions taken during the year (3.4)
- Permittees urged to use Annual Reporting form in Appendix I

NEW! All monitoring and reports can be submitted online, using the eNOI system to report

SWPPP

What Must Be In My Storm Water Pollution Prevention Plan (SWPPP)?



Development of a Storm Water Storm Pollution Prevention Plan (SWPPP)

- All operators must develop a SWPPP prior to submitting NOI (5)
 - Available Guidance: EPA Guide for Developing an Industrial SWPPP
- Existing dischargers should start from existing SWPPP, and modify accordingly to comply with 2008 MSGP
- SWPPP must address 7 elements (5.1)

SWPPF

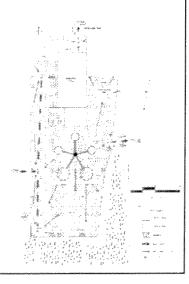
Element # 1: Stormwater Pollution Prevention Team

- SWPPP must identify all staff (including consultants) that are part of the Team, including description of their respective responsibilities (5.1.1)
- Team members must have ready access to relevant portions of the permit and the SWPPP (5.1.1)

SWPPP

Element # 2: Site Description

- SWPPP must include (5.1.2):
 - Description of industrial activities at site
 - General location map
 - Site map



SWPPI

Element # 2: Site Description (cont.)

- Key items to include on site map (5.1.2)
 - Location of industrial activities exposed to precipitation
 - Location of significant structures and impervious surfaces, structural control measures, stormwater conveyances, monitoring points, inlets and outfalls
 - Location of all receiving waters in immediate vicinity
 - Indicate if waters are impaired and if a TMDL is established
 - Location of potential pollutant sources and where significant spills or leaks have occurred

Element # 3: Summary of Potential **Pollutant Sources**



- Document any areas where "industrial materials or activities" are exposed to stormwater (5.1.3)
- Industrial materials or activities includes:
 - Material handling equipment or activities
 - Industrial machinery
 - Raw materials
 - Industrial production and processes
 - Intermediate products, by-products, final products, and waste products



Element # 3: Summary of Potential Pollutant Sources (cont.)

- For each area exposed to stormwater, include:
 - A list of exposed industrial activities (5.1.3.1)
 - A list of pollutants or pollutant constituents associated with each activity (5.1.3.2)
 - Documentation of where potential spills and leaks could occur or have occurred in the past 3 years, and the corresponding outfalls (5.1.3.3)
 - Documentation of any evaluations for presence of nonstormwater discharge and that unauthorized discharges were eliminated (5.1.3.4)
 - Location of storage piles containing salt (5.1.3.5)
 - Summary of previous stormwater monitoring data (5.1.3.6)



Element # 4: Description of Control Measures

- Describe practices you will install and implement to eliminate or reduce all pollutant in stormwater discharges from the facility
- Document location and type of control measures (5.1.4.1)
 - Indicate which control measures are used to meet each applicable effluent limitation
 - Describe any agreed-upon endangered species or NEPArelated requirements
 - Describe how control measures address pollutant sources and run-on that commingles with stormwater discharge
- Describe how selection and installation of control measures followed list of Part 2.1.1 considerations

Element # 5: Schedules and Procedures

- Documentation of schedules and procedures to be used for complying with select effluent limits (5.1.5.1):
 - Good housekeeping
 - Maintenance
 - Spill prevention and response
 - Employee training



SWPPF

Element # 5: Schedules and Procedures (cont.)

- Documentation of schedules and procedures to be used for monitoring and inspections (5.1.5.2)
 - For example:
 - Who will perform activities
 - Where sampling will occur
 - Why the facility has concluded that 2 or more outfalls are substantially identical
 - What monitoring schedules and procedures will be followed
 - What areas of facility will be inspected

Element # 6: Eligibility Under Federal Laws

- SWPPP must include documentation (5.1.6) supporting the facility's claim of eligibility relating to:
 - Endangered species
 - Eligibility criteria modified (1.1.4.5)
 - New information required for existing and new dischargers to demonstrate that discharge is not likely to adversely affect species (Criterion E)
 - If relying on another operator's previous eligibility, required to notify EPA of prior operator's permit tracking number (Criterion F)

SWPP

Element # 6: Eligibility Under Federal Laws

- SWPPP must include documentation (5.1.6) supporting the facility's claim of eligibility relating to:
 - Historic properties
 - Eligibility criteria modified based on the minimal opportunity for industrial stormwater discharges to affect most historic properties (1.1.4.6)



Element # 6: Eligibility Under Federal Laws

- SWPPP must include any documentation (as instructed in 5.1.6.3) supporting the facility's claim of eligibility relating to:
 - NEPA Review
 - Discharges Subject to Any New Source Performance Standards (1.1.2.5)
 - For example, regarding mineral mining, this is referred to in 8.J.5.3

SWPPP

Element #7: Signature

SWPPP must be signed by a responsible corporate officer, general partner, or principal executive officer/ranking elected official or duly authorized representative (5.1.7)

What can differ are...

- Who signs the NOI
- Who signs the SWPPP



Submit NOI

How Do I Submit My Notice of Intent (NOI)?

EPA's eNOI System

www.epa.gov/npdes/eNOI

Submit and modify...

- Notices of Intent (NOIs)
- Notices of Termination (NOTs)
- No Exposure forms (NOEs)

NOI Submittal Deadlines						
Discharger Categor/	I.OI Supmission Deadline	Discharge Authorization Date				
iki dine Sibidizar iro krestres arcini (k. 2009-1805)	ilo beg (desamble), 27. 2009 (00 los comes charts de careno 8 may 10)	10 Seys, distribution of dr. 10 Geo. 2000 See 907 (gelss) 10 Seats				
Lisur Dischargers or Figur Grundes — if sourced discharging between October 30, 2005 and Feb 27, 2009 feets a Land die voodspoor Equilial and which die voodspoor Las Land made die voor in Englan 100	A 5 soon as possible but no later than blay 27, 2009 Haddys deals muticalisassin Segion 103	30 cays after 88, species di alter ancies un bolic				
then the horeers content learness some discharging after heb. To 4005 (in tream), If she had inher 100	2 minimum of 60 days prior to communicing discharge, or a minimum of 30 days if the SWARE is gosted on the Income of during this period.	If the Sayon is post to an the arctimer, 30 days the r els posts your JOL Otherwise, 50 days site rela- posts the JOL nice website				

Submit

NOI Submittal Deadlines: Existing Dischargers

- Existing Dischargers (covered by MSGP 2000)
 - Submit NOI no later than May 27, 2009
 - Discharge authorization begins 30 days after EPA posts your NOI
 - Coverage under MSGP 2000 continues until you get permit coverage under 2008 MSGP

Submi NOI

NOI Submittal Deadlines: New Dischargers

- If started discharging before Feb. 27, 2009:
 - Submit NOI by May 27, 2009
 - Discharge authorization begins 30 days after EPA posts your NOI
- If started discharging after Feb. 27, 2009:
 - Submit NOI at least 60 days before commencing discharge (30 days if SWPPP posted)
 - Discharge authorization begins 30-60 days after EPA posts your NOI

Submit NOI

Changes to NOI

 Major change from the 2000 MSGP—with MSGP 2008, availability of eNOI for all permittees

NOI now asks about...

- Receiving water:
 - Is it impaired? For what pollutants?
 - Are pollutants present in your discharge?
 - Total Maximum Daily Load (TMDL) approved?
 - For new dischargers, is the receiving water a Tier 2 or Tier 3 water?
- Will the site be inactive and unstaffed?
- For new dischargers, internet site of SWPPP

Submi

Endangered Species

- Waiting period extended to 30 days for permit coverage (up to 60 days for new dischargers)
- Eligibility criteria modified (1.1.4.5)
 - New information required for existing and new dischargers to demonstrate that discharge is not likely to adversely affect species (Criterion E)
 - If relying on another operator's previous eligibility, required to notify EPA of prior operator's permit tracking number (Criterion F)
- Benchmarks revised
 - Ammonia (Sectors K and S)
 - Hardness-dependent metals(Sectors A, C, F, G, K, M, N, Q, Y, AA)



5ubmi NOI

Historic Properties

- Eligibility criteria modified based on the minimal opportunity for industrial stormwater discharges to affect most historic properties (1.1.4.6)
- Potential impacts to historic properties limited to subsurface impacts that are 1 acre or less
 - Requires contact with State or Tribal historic property agencies
 - Where no response within 30 days, discharger may assert eligibility under permit
 - If no agreement on measures to mitigate potential effects forthcoming, discharger may assert eligibility, providing EPA opportunity to get involved



Submit NOI

Key Features

- Allows you to modify the forms submitted electronically
- Allows information already in the system to be pre-populated
- Allows you to view the status of forms saved in the system
- Maps the site location and the latitude/longitude value to provide a visualization

Submit NOI

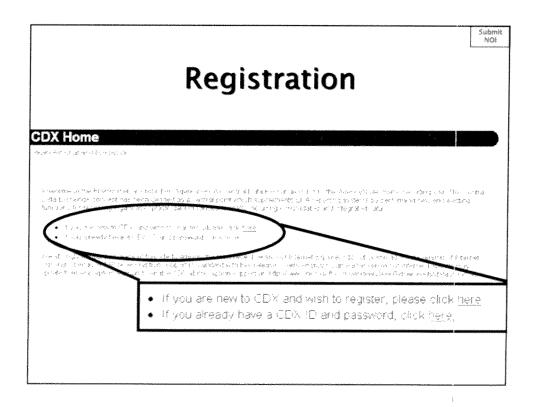
Key Features (Cont'd)

- Eligibility criteria modified based on the minimal opportunity for industrial stormwater discharges to affect most historic properties (1.1.4.6)
- Provides additional help text, including a keyword search function for FAQs and glossary terms as well as hyperlinks to definitions and explanatory text
- Provides drop-down menus to reduce errors
- Has two views to choose from:
 - Standard view walks you through the process step-bystep on multiple pages
 - Expert view allows you to enter information on one page with reduced explanatory text

Submit NOI

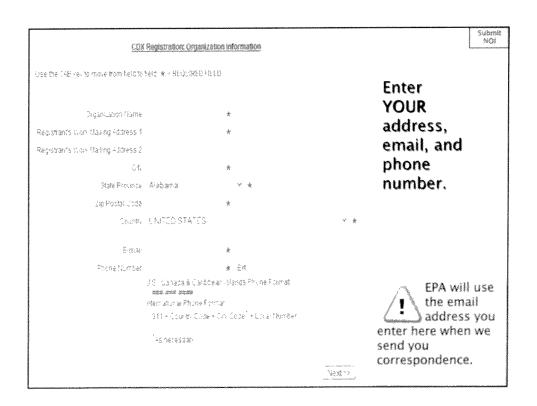
Things to Note

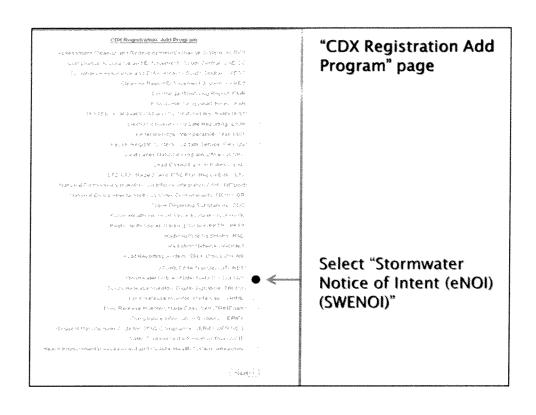
- If your account is inactive for 12 minutes then you will be logged out of the system.
- You should only have one account since you will not be able to see all of your forms if you have multiple accounts with the same email address.

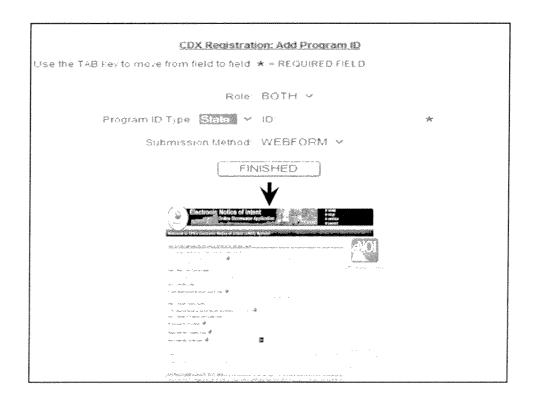


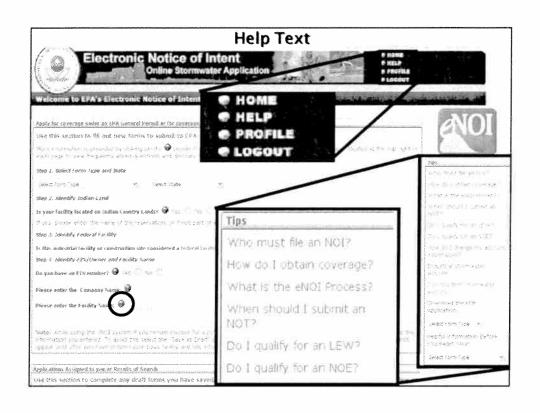
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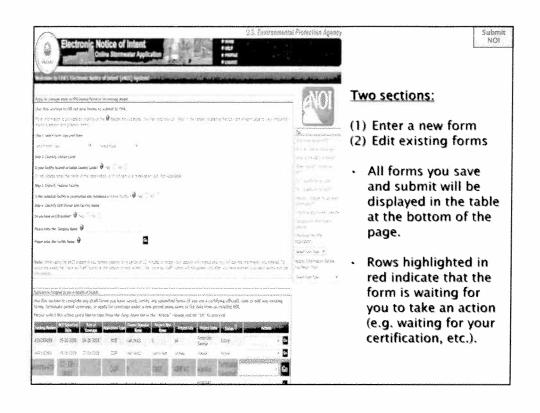


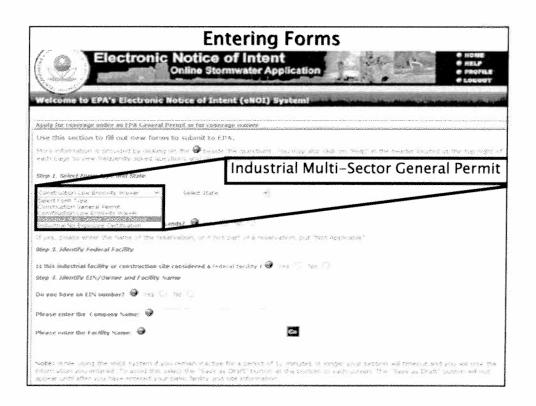


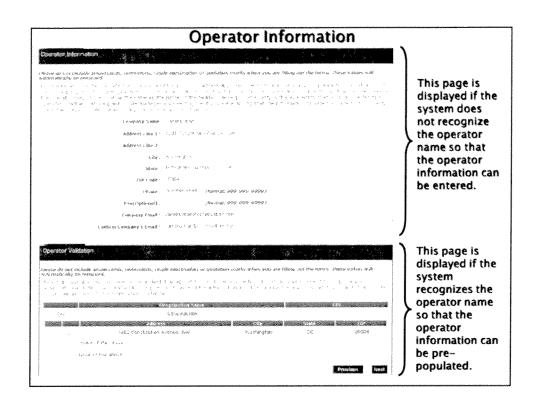


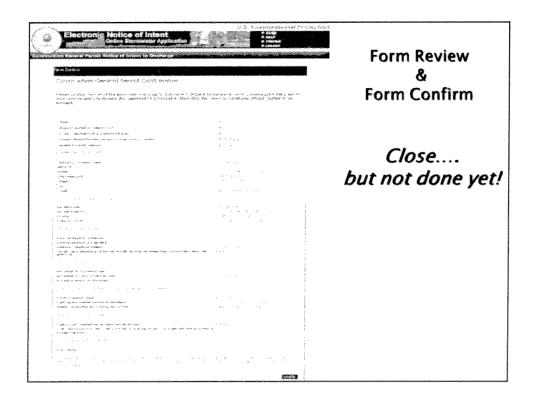




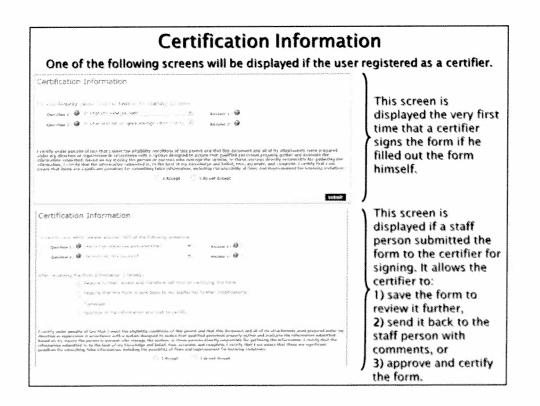








Designate Certifying Official One of the following screens will be displayed if the user registered as a staff person. This screen is displayed if there celebral Officer being 🚱 France Contaguag Chilored Later 😝 Landon are no certifiers Continuous Delicial Company of wisher (mailtres arech the con associated yet abuse sectorying softends sough , who she "greet events in the with the facility/site. This screen is the country of the property contribution of the contribution of the country that country the country of the property contribution of the country that country the country that t displayed if there . octobypos kithic at breast are certifiers t meetings t membrancy control to anath w 131 NAV1 + 4 already associated county may station the releases. with the countying attitud cities 📦 facility/site. There are two options: select a previous certifier or enter a Enter the same email address that is new one. associated with the certifier's account.



Submit NÖI

Confirmation

Via eNOI

You will receive a "Thank You" page and an automatically generated email will be sent to you.

Via Paper

As soon as the form is entered into the system by the NOI Call Center a letter will be sent to the operator address specified on the form.

Submi NOI

Important Contacts

Registration Questions

If you have questions regarding registration, changing your email or your account please visit CDX Frequently Asked Questions

(https://cdx.epa.gov/SSL/cdx/FAQ.asp) or contact CDX using the following options:

- Telephone: 888-890-1995 (available M-F 8:00 am to 6:00 pm (EST)).
- E-mail: Send an e-mail to Technical Support at EPACDX@CSC.COM with "Technical Support" in the Subject line.
- Fax: 301-429-3905 (responses sent M-F 8:00 am to 6:00 pm (EST)).

eNOI System Questions

If you have questions about the eNOI system, check the website (www.epa.gov/npdes/eNOI) or contact the EPA's NOI Processing using the following options:

- **Telephone**: 866-352-7755 (available M-F 8:00 am to 5:00 pm (EST)).
- E-mail: Send an e-mail to Technical Support noi@avanticorporation.com
- **Webform**: Fill out the online form at www.epa.gov/npdes/noicontact

No Exposure Certification

If you don't have machinery, equipment, materials, residuals, products, waste materials, process wastewater, particulate matter, etc. exposed outside and exposed to stormwater, then you might qualify for a "no exposure" exclusion.

The checklist in the No Exposure form in Appendix K

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NOTE!
To qualify for this exclusion, it must apply to the ENTIRE facility.

Examples of Compliance Issues at Industrial Sites

From a shipyard...



Before: Paint chips from tarps exposed to weather & stormwater



After: BMP's were modified in SWPPP to collect residual debris from tarps





Before: No secondary containment or cover of paint containers and other materials

After: Additional secondary containment pans were fabricated



More shipyard issues...



Before: Blasting material to remove paint accumulated outside shop door, exposed to the elements



After: Accumulated abrasive blasting material was removed. Modifications are being made to the door to prevent the material from leaving the building and weekly cleanup requirements were added to the SWPPP

How do I comply with the Permit?

- Determine if your facility is eligible for coverage under the Permit. Read the Permit and its Fact Sheet. Understand the sectorspecific requirements for your facility.
- Develop (or update) the facility's site-specific stormwater pollution prevention plan (SWPPP)
- 3. Complete and submit the Notice of Intent (NOI).
- 4. Implement the SWPPP and begin monitoring and reporting of discharges.

Implement Your SWPPP, in which you documented how you will...

- Comply with effluent limits
- Conduct inspections
- Conduct monitoring
- Carry out corrective actions
- Keep records and submit an Annual Report

Helpful Resources

EPA National Website for Industrial Stormwater...

http://www.epa.gov/npdes/stormwater/indust.cfm

Training Resources for Stormwater

http://www.epa.gov/npdes/outreach.cfm?program_id=0&otype=1 e.g., EPA webcast on MSCP monitoring

- SWPPP Preparation
 - University of Georgia http://www.gatechenvironment.com/index.htm
- ...and for the 2008 Multi-Sector General Permit

http://www.epa.gov/npdes/stormwater/msgp.cfm

- EPA industrial stormwater monitoring guidance
- EPA Region 10's Website for Water
 http://yosemite.epa.gov/R10/WATER.NSF

 Click on "Storm Water" and from there, click on "Industrial" for more information on the MSGP 2008 in Region 10

Helpful Resources

in the US Environmental Protection Agency, Region 10 - Seattle Office

In the Office of Compliance & Enforcement, NPDES Unit Julie Congdon Stormwater Compliance Assistance Coordinator 206.553.2752 or 1.800.424.4372, x. 2752 congdon.julie@epa.gov

In the Office of Water & Watersheds, NPDES Permits Unit Michael Le Stormwater Industrial Permits 206.553.1099 or 1.800.424.4372, x. 1099 le.michael@epa.gov

Helpful Resources

at the Alaska Department of Environmental Conservation

William Ashton, Section Manager Stormwater/Wetlands 907.269.6283 william.ashton@alaska.gov

Nathan Patry, Senior Compliance Officer Water Quality Compliance and Enforcement 907.269.7956 nathan.patry@alaska.gov